

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

FTX TRADING LTD. and MACLAURIN
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 23-23-50437 (JTD)

**[PROPOSED] ORDER GRANTING
DEFENDANTS' MOTION TO DISMISS OR ABSTAIN**

UPON CONSIDERATION of Defendants' *Motion to Dismiss Complaint by Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG* ("**Motion**"), and the Court having reviewed the Motion, *Brief in Support of Motion to Dismiss Filed by Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum, UG* ("**Joint Brief**"), and the responses and replies thereto, if any; and the Court having determined that the legal and factual bases set forth in the Motion and Joint Brief establishes just cause for the relief granted the Motion; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted.
2. The Complaint is dismissed, with prejudice.